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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

JAN 26 1993
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Implementation of Section 8 of the Cable
Television Consumer Protection
and Competition Act of 1992)

MM Docket No. 92-263

Consumer Protection and Customer
Service)

REPLY COMMENTS OF GTE

GTE Service Corporation ("GTE"), on behalf of its domestic telephone operating companies and GTE Laboratories Incorporated, offers its reply to filings responding to the Commission's Notice of Proposed Rule Making ("NPRM") in the above referenced proceedings, FCC 92-541, released December 11, 1992. The NPRM seeks comment on the adoption and implementation of Section 8 of the Cable Television Consumer Protection and Competition Act of 1992, P.L. No. 102-385, 102 Stat. 1460 ("Cable Act of 1992").

Congress has found continued and widespread customer dissatisfaction with the customer service provided by many cable operators. Significant areas of customer dissatisfaction include: phones are not answered promptly, offices are open for a minimal number of hours, and service call response takes too long.¹ Though the cable industry has adopted voluntary standards concerning matters such as telephone response time, installation, outages, and service calls,

¹ Senate Comm. on Commerce, Science and Transportation, S. Rep. No. 102-92, 102d Cong., 2d Sess., at 20 (1991).

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Congress still regards customer service as “an area of paramount concern.”² Congress questions the degree of compliance to the voluntary standards by cable systems, and enacted service provisions as part of the Cable Act of 1992.

The Commission should adopt a set of minimum customer service standards and institute an “escalating benchmark” to increase service minimums.

The Commission (NPRM at ¶10) sought comment on the customer service standards to be adopted in this proceeding and asked whether the National Cable Television Association (“NCTA”) standards, or some modification thereof, might provide appropriate benchmarks. NCTA standards for office and telephone availability, installations, outages, and service calls were presented in detail (NPRM at ¶¶ 11 and 13). The Commission also asked (NPRM at ¶19) if it could adopt an “escalating benchmark” approach that would reasonably increase the service minimums over time as cable operators demonstrate improvements in their customer service efforts. GTE’s reply comments focus entirely on these questions.

As did several commenting parties,³ GTE believes the NCTA standards provide an appropriate benchmark for minimum customer service standards and should be adopted by the Commission. Many cable systems have voluntarily adopted these standards previously and should be able to achieve compliance without impacting current cable rates in any fashion. As a regulated local exchange carrier (“LEC”) GTE is subject to a variety of similar customer service standards. Overall, LEC customer service standards are higher than the

² House Comm. on Energy and Commerce, H.R. Rep. No. 102-628, 102d Cong. 2d Sess. at 105 (1992).

³ City of Miami Beach, Florida at 4, City of Dallas at 5, New York State Commission on Cable Television at 9, Comcast Corporation, Cox Communications, Inc. and Jones Intercable, Inc. at 3, Cole, Raywid & Braverman at 7, Northwest Municipal Council at 3.

NCTA standards. GTE believes the Commission should use NCTA standards to establish initial requirements and transition over time (an “escalating benchmark”) to the level of current LEC standards.

GTE suggests cable system standards be modeled after existing LEC customer service standards.

GTE proposes cable system customer service standards be modeled after existing LEC customer service standards. GTE is subject to customer service standards in each of the 40 states in which it operates as an exchange carrier. The remaining portions of these reply comments contrast typical GTE standards to the NCTA standards described in the NPRM.

Paragraph 11 describes standards for the area of office and telephone availability. GTE must have knowledgeable, qualified company representatives available to respond to customer service inquiries Monday through Friday during normal business hours.⁴ Similar company representatives must be available 24 hours per day to respond to customer repair requests. Telephone answer time objectives, including wait time and time required to transfer a call, typically require that 90% of all calls be answered within 20 seconds. Bill payment locations are open for transactions Monday through Friday during normal business hours.

Paragraph 13 describes standards relating to installations, outages, and service calls. GTE must perform 90% of standard installations within five business days, with a few state jurisdictions requiring 90% within three working days. For service interruptions, 95% must be responded to and cleared within 24 hours. An additional standard involves instances of service trouble, and GTE is measured against a typical monthly standard of 5-7 occurrences per 100

⁴ In the telephone industry, normal business hours are on the order of 9 a.m. to 5 p.m.

access lines. GTE believes this could be similarly measured for each 100 customers of a cable system. Appointment windows are similar to NCTA alternatives, but GTE must meet 90% of all scheduled appointment commitments.

CONCLUSION

GTE urges the Commission to adopt NCTA's standards to establish initial minimum customer service standards and develop an "escalating benchmark" approach to increase service minimums over time. GTE proposes LEC service standards be used as a model for these increased service standard minimums.

Respectfully submitted,

GTE SERVICE CORPORATION

By 

Ward W. Wueste, Jr., E3J43
Marceil Morrell
GTE Telephone Operations
P.O. Box 152092
Irving, Texas 75015-2092
(214) 718-6314

James R. Hobson
Jeffrey O. Moreno
Donelan, Cleary, Wood & Maser, P.C.
1275 K Street N.W., Suite 850
Washington, D.C. 20005-4078
(202) 371-9500

January 26, 1993

ITS ATTORNEYS

Certificate of Service

I, Ann D. Berkowitz, hereby certify that copies of the foregoing "Reply Comments of GTE" have been mailed by first class United States mail, postage prepaid, on this 26th day of January, 1993 to all parties on the attached list.



Ann D. Berkowitz

MGB Associates, Inc.
236 Ivy Lake Drive
Forest, VA 24551

Robert Abrams
Attorney General
State of New York
120 Broadway
Suite 2601
New York, NY 10271

J. Merritt Belisle
Classic Cable
400 W. 15th Street
Austin, TX 78701

Daniel L. Brenner
National Cable Television Assoc., Inc.
1724 Massachusetts Ave., NW
Washington, DC 20036

Joan Burke
Cable Administrator
City of Kalamazoo, Michigan
230 E. Crosstown Parkway
Kalamazoo, MI 49001

Jay Busch
Triax Communications Corporation
100 Fillmore Street
Denver, CO 80206

Stephen E. Coran
Attorney
Brown Finn & Nietert, Chartered
1920 N Street, N.W.
Suite 600
Washington, DC 20036

David Cosson
Attorney
National Telephone Cooperative Assoc.
2626 Pennsylvania Ave., N.W.
Washington, DC 20037

Bruce Crest
Administrator
Metropolitan Area Communications Commissi
1815 NW 169th Place
Suite 6020
Beaverton, OR 97006-4886

Stephen R. Effros
President
Community Antenna Television Association
3950 Chain Bridge Road
P.O. Box 1005
Fairfax, VA 22030

Janis D. Everhart
Assistant City Attorney
Office of the City Attorney
City of Dallas
1500 Marilla
Room 7/D/N
Dallas, TX 75201

Peter H. Feinberg
Attorney
Dow, Lohnes & Albertson
1255 Twenty-third Street, NW
Suite 500
Washington, DC 20037

Randall D. Fisher
General Counsel
Adelphia Communications Corporation
5 West Third Street
Coudersport, PA 16915

Joe Floyd
Midcontinent Media, Inc.
7900 Xerxes Avenue South
Minneapolis, MN 55431-1108

Gardner F. Gillespie
Attorney
Hogan & Hartson
Columbia Square
555 Thirteenth Street, N.W.
Washington, DC 20004-1109

Tommy L. Gleason
Galaxy Cablevision
1220 N. Main
Sikeston, MO 63801

Paul Glist
Attorney
Cole Raywid & Braverman
1919 Pennsylvania Avenue, N.W.
Suite 200
Washington, DC 20006

Donna C. Gregg
Attorney
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

John L. Grow
Attorney
New York State Commission
on Cable Television
Corner Tower Building
Empire State Plaza
Albany, NY 12223

Michael H. Hammer
Attorney
Willkie, Farr & Gallagher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036-3384

Scott Harshbarger
Attorney General
Commonwealth of Massachusetts
John W. McCormack State Office Building
One Ashburton Place
Boston, MA 02108-1698

Thomas P. Kerester
Attorney
Office of Advocacy
United States Small Business Administration
409 3rd Street, SW
Washington, DC 20416

John Kilian
Vantage Cable
1025 Ashworth Road
West Des Moines, IA 50265

Matthew L. Leibowitz
Attorney
Leibowitz & Spencer
One S.E. Third Avenue
Suite 1450
Miami, FL 33131

Janice L. Lower
Attorney
Duncan, Weinberg, Miller
& Pembroke, P.C.
1615 M Street, NW
Suite 800
Washington, DC 20036

John H. Midlen, Jr.
Attorney
Midlen & Guillot, Chartered
3238 Prospect Street, NW
Washington, DC 20007-3214

Kay Monigold
Buford Television, Inc.
2010 Cybil Lane
Tyler, TX 75703

Thomas P. Nicholas
President
Greater Metro Cable Consortium
14949 E. Alameda Dr.
Aurora, CO 80012

John W. Pestle
Attorney
Varnum, Riddering, Schmidt & Howlett
171 Monroe Avenue, NW
Suite 800
P.O. Box 352
Grand Rapids, MI 49503

Michael J. Pohl
Douglas Cable Communications, Inc.
1200 East Ridgewood Avenue
Ridgewood, NJ 07450

William R. Poole
5510 S.W. 5th Street
Plantation, FL 33317

Paul W. Scott
USA Cablesystems, Inc.
MWI Cablesystems, Inc.
35 Industrial Drive
Martinsville, IN 46151

Norman M. Sinel
Attorney
Arnold & Porter
1200 New Hampshire Avenue, N.W.
Washington, DC 20036

Carole Stannard-Gabor
Executive Director
Northwest Municipal Cable Council
112 N. Belmont Avenue
Arlington Heights, IL 60004

Joseph Van Eaton
Michael D. Berg
Miller & Holbrooke
1225 Nineteenth St., NW
Suite 400
Washington, DC 20036

Thomas L. Welch
Chief Deputy Attorney General
Office of Attorney General
1435 Strawberry Square
Harrisburg, PA 17120